

BONNER STINSON, P.C.
LAWYERS

Bradley D. Bonner
Laurence W. Stinson*
* Also admitted in Montana

1421 Rumsey Avenue
Cody, Wyoming 82414
(307) 587-0300
(307) 527-6092 (fax)

Sender's e-mail:
laurence@bonnerstinsonpc.net
www.bonnerstinsonlaw.com

SENT VIA E-MAIL AND U.S. MAIL

February 8, 2012

R. Daniel Fleck
M. Kristeen Hand
The Spence Law Firm, LLC
15 South Jackson
P.O. Box 548
Jackson, Wyoming 83001

Re: *Biles v. Fallon; Biles v. Schneider*

Dear Dan and Kristeen:

I have previously requested that you provide me with a copy of Lisa Shaurette Fallon's deposition, taken in *Biles v. Fallon*, Civil No. 11-CV-294-J. To date, I have not received a copy. I write to again request that you provide our office with a copy of the deposition by Friday, February 10, 2012. We will agree to a protective order regarding the deposition and will agree to not disseminate the transcript outside of litigation.

During the January 4, 2012 hearing, Judge Johnson specifically asked for a copy of the deposition, which Dan agreed to provide. To my knowledge, this has not been done. Please provide a copy to the court as promised.

We need the deposition in order to raise possible defenses to Plaintiff's claims and Defendants Schneider will be prejudiced if the deposition is not produced. Moreover, failure to provide the deposition will require us to re-depose Ms. Fallon, which is unnecessary at this time. This will result in unnecessary expense and burden to both my client and yours.

If you will not voluntarily provide Ms. Fallon's deposition by this Friday, February 10, 2012, or make arrangements to do so in a reasonable time,



February 8, 2012
Page 2

I will file a motion with the court requesting it to direct you to provide us with a copy or if you have provided it to the court, we will seek its release.

Thank you, Dan and Kristeen.

Very truly yours,

/s/

LAURENCE W. STINSON